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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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COMMISSIONER

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IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S STATEMENT  
OF GENERALLY AVAILABLE TERMS AND  
CONDITIONS.

DOCKET NO. T-01051B-99-0068

IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S COMPLIANCE  
WITH §271 OF THE  
TELECOMMUNICATIONS ACT OF 1996.

97  
DOCKET NO. T-01051B-99-0238**NOTICE OF ERRATA**

Qwest Corporation ("Qwest") hereby provides notice of errata to its Compliance Filing Modifying Qwest's SGAT to Adopt Collocation Provisioning Intervals Set by the FCC (the "Compliance Filing") which was filed in these proceedings on November 22, 2000. Page one and page five contained typographical errors. Attached hereto are corrected versions of pages one and five to Qwest's Compliance Filing. Exhibit 1 to the Compliance Filing was an incorrect version. A corrected Exhibit 1 is also attached hereto. These corrected versions are intended to replace the ones filed on November 22, 2000.

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DATED this 28<sup>th</sup> day of November, 2000.

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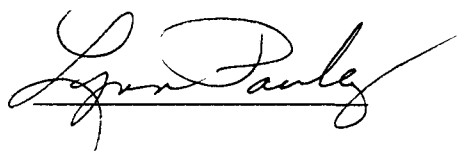
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A handwritten signature in cursive script, appearing to read "Leonard Stanley", written over a horizontal line.

**EXHIBIT 1**  
**Collocation**  
**CP-1 – Installation Interval**

<b>Purpose:</b> Evaluates the timeliness of Qwest's installation of collocation arrangements for CLECs, focusing on the average time to complete such arrangements.	
<b>Description:</b> Measures the interval between the receipt of the down payment from the CLEC and the completion of the collocation installation, expressed in calendar days. <ul style="list-style-type: none"> <li>Includes all collocations assigned a Ready For Service (RFS) date by Qwest and completed during the reporting period, subject to exclusions specified below.</li> </ul>	
<b>Reporting Period:</b> One month	<b>Unit of Measure:</b> Average Calendar Days
<b>Reporting Comparisons:</b> CLEC aggregate and individual CLEC results	<b>Disaggregation Reporting:</b> Statewide level. Results for this indicator are disaggregated and reported as follows: A-1 Virtual, Physical Caged, and Shared Collocation. A-2 Augments to Virtual, Physical Caged, and Shared Collocations. B-1 Cageless Collocations. B-2 Augments to Cageless Collocations.
<b>Formula:</b> $\Sigma[(\text{Collocation Completion Date}) - (\text{Collocation Interval Start Date})] / (\text{Total Number of Collocations Completed in Reporting Period})$	
<b>Exclusions:</b> <ul style="list-style-type: none"> <li>CLEC orders involving requests for RFS dates yielding longer than 90 calendar day intervals.</li> <li>RFS dates missed for CLEC-not-ready;</li> <li>RFS dates missed for CLEC equipment delays.</li> </ul>	
<b>Product Reporting:</b> <ul style="list-style-type: none"> <li>Virtual, Physical Caged, and Shared Collocation</li> <li>Cageless Collocation</li> </ul>	<b>Standard:</b> 90 calendar days
<b>Availability:</b> Available	<b>Notes:</b>



## CP-2 – Installation Commitments Met

<b>Purpose:</b> Evaluates the extent to which Qwest completes collocation arrangements for CLECs as scheduled or promised.	
<b>Description:</b> Measures the percentage of collocation orders for which the Ready For Service (RFS) date is met. <ul style="list-style-type: none"> <li>Includes all collocations assigned a RFS date by Qwest and completed within the reporting period, including those with CLEC-requested RFS dates longer than the standard interval and those with extended RFS dates negotiated with the CLEC (including supplemented collocation orders that extend the RFS date).</li> <li>A collocation arrangement is counted as met under this measurement if its Collocation Completion Date is the same as, or earlier than, the assigned RFS date.</li> <li>For CLECs with interconnection agreements that specify collocation installation intervals, and for individually negotiated intervals, the agreed-upon interval is the one measured.</li> <li>For CLECs with interconnection agreements that do not specify collocation installation intervals, the intervals applied for this measurement will be 90 calendar days for all types of collocation and augments thereto.</li> </ul>	
<b>Reporting Period:</b> One month	
<b>Unit of Measure:</b> Percent	
<b>Reporting Comparisons:</b> CLEC aggregate and individual CLEC results	<b>Disaggregation Reporting:</b> Statewide level. Results for this indicator are disaggregated and reported as follows: A-1 Virtual, Physical Caged, and Shared Collocation A-2 Augments to Virtual, Physical Caged, and Shared Collocations. B-1 Cageless Collocations. B-2 Augments to Cageless Collocations.
<b>Formula:</b> $\left[ \frac{\text{Count of Collocations with Collocation Completion Dates that are the same as, or earlier than, the assigned Ready for Service Date}}{\text{Total Number of Collocations Completed in the Reporting Period}} \right] \times 100$	
<b>Exclusions:</b> <ul style="list-style-type: none"> <li>RFS dates missed for CLEC-not-ready;</li> <li>RFS dates missed for CLEC equipment delays.</li> </ul>	
<b>Product Reporting:</b> <ul style="list-style-type: none"> <li>Virtual, Physical Caged, and Shared Collocation</li> <li>Cageless Collocation</li> </ul>	<b>Standard:</b> 90 percent or more
<b>Availability:</b> Available	<b>Notes:</b>

### CP-4 – Feasibility Study Commitments Met

<b>Purpose:</b> Evaluates the degree that Qwest met its stated commitment in the sub-process function of providing a collocation feasibility study to the CLEC.	
<b>Description:</b> Measures the percentage of collocation feasibility studies for installations that are completed within the allotted time frame for such studies. <ul style="list-style-type: none"> <li>• Includes all feasibility studies associated with collocation arrangements completed in the reporting period.</li> <li>• For CLECs with interconnection agreements that identify a collocation feasibility study interval, and for individually negotiated intervals, the agreed-upon interval is the one measured.</li> <li>• For CLECs without interconnection agreements that identify a collocation feasibility study interval, the interval measured is 7 business days for virtual collocation and 10 business days for physical collocation.</li> </ul>	
<b>Reporting Period:</b> One month <b>Unit of Measure:</b> Percent	
<b>Reporting Comparisons:</b> CLEC aggregate and individual CLEC results	<b>Disaggregation Reporting:</b> Statewide level. Results for this indicator are disaggregated and reported as follows: A-1 Virtual and Physical Caged and Shared Collocation A-2 Augments to Virtual and Physical Caged and Shared Collocations. B-1 Cageless Collocations. B-2 Augments to Cageless Collocations.
<b>Formula:</b> [(Total Applicable Collocation Feasibility studies completed in agreed-upon timeframe) / (Total applicable Collocation Feasibility studies completed)] x 100	
<b>Exclusions:</b> None	
<b>Product Reporting:</b> <ul style="list-style-type: none"> <li>• Virtual, Physical Caged, and Shared Collocation</li> <li>• Cageless Collocation</li> </ul>	<b>Standard:</b> 90 percent or more
<b>Availability:</b> <div style="text-align: center;">Available</div>	<b>Notes:</b>

### CP-6 – Quote Commitments Met

<b>Purpose:</b> Evaluates the degree that Qwest met its stated commitment in the sub-process function of providing a collocation quote to the CLEC.	
<b>Description:</b> Measures the percentage of Central Office collocation quotes that are completed within the allotted time frame. <ul style="list-style-type: none"> <li>Includes quotes associated with collocation arrangements that are completed in the reporting period.</li> <li>For CLECs with interconnection agreements that identify a collocation quote interval, and for individually negotiated intervals, the agreed-upon interval is the one measured.</li> <li>For CLECs without interconnection agreements that identify a collocation quote interval, the interval measured is 25 calendar days.</li> </ul>	
<b>Reporting Period:</b> One month	<b>Unit of Measure:</b> Percent
<b>Reporting Comparisons:</b> CLEC aggregate and individual CLEC results	<b>Disaggregation Reporting:</b> Statewide level. Results for this indicator are disaggregated and reported as follows: A-1 Virtual and Physical Caged and Shared Collocation A-2 Augments to Virtual and Physical Caged and Shared Collocations. B-1 Cageless Collocations. B-2 Augments to Cageless Collocations.
<b>Formula:</b> $\frac{[(\text{Total Applicable Collocation Quotations completed in agreed-upon timeframe}) / (\text{Total applicable Collocation Quotations completed})] \times 100}{}$	
<b>Exclusions:</b> None	
<b>Product Reporting:</b> <ul style="list-style-type: none"> <li>Virtual Physical Caged and Shared Collocation</li> <li>Cageless Collocation</li> </ul>	<b>Standard:</b> 90 percent or more
<b>Availability:</b> <div style="text-align: center;">Available</div>	<b>Notes:</b>

**BEFORE THE ARIZONA CORPORATION COMMISSION**

CARL J. KUNASEK  
CHAIRMAN  
JIM IRVIN  
COMMISSIONER  
WILLIAM A. MUNDELL  
COMMISSIONER

IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S STATEMENT  
OF GENERALLY AVAILABLE TERMS AND  
CONDITIONS.

DOCKET NO. T-01051B-99-0068

IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S COMPLIANCE  
WITH §271 OF THE  
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-01051B-99-0238

**COMPLIANCE FILING MODIFYING QWEST'S SGAT TO ADOPT COLLOCATION  
PROVISIONING INTERVALS SET BY THE FCC**

Qwest Corporation ("Qwest") hereby requests that the Arizona Corporation Commission ("Commission") allow Section 8.4 of Qwest's Statement of Generally Available Terms ("SGAT") to be modified through operation of law by the physical collocation provisioning intervals set by the Federal Communications Commission ("FCC").<sup>1</sup> According to the FCC, the Commission should allow these new intervals to take effect 60 days after this filing pursuant to Section 252(f)(3)(B) of the Act.<sup>2</sup> Qwest makes this filing such that the SGAT modifications will become effective on January 21, 2001, the deadline set forth in the FCC's *Amended Order*.<sup>3</sup>

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<sup>1</sup> See *Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Order on Reconsideration and Second Further Notice of Proposed Rulemaking in CC Docket No. 98-147 and Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, FCC 00-297 (rel. Aug. 10, 2000) ("Order on Reconsideration" or "Order"), as amended by Memorandum Opinion and Order, FCC 00-2528 (rel. Nov. 7, 2000) ("Amended Order").

<sup>2</sup> Standards within the SGAT that comport with the FCC Order "take effect when the state commission permits the amendments to take effect through operation of law." *Amended Order* at ¶7.

<sup>3</sup> *Amended Order* at ¶21

The *Amended Order* left it to the state commissions to determine whether longer intervals are appropriate under certain circumstances.<sup>10</sup> For example, as stated in Qwest's Petition for Waiver to the FCC, when "major infrastructure modifications" are required, and the CLEC did not forecast the collocation, additional time is necessary to complete the collocation. "Major infrastructure modifications" include the addition of (a) DC Power Plants; (b) AC Standby Generators; (c) HVAC; and (d) Space Conditioning.

During the 271 workshops, Qwest will also seek an extension of the 90 day interval in two circumstances where it is physically impossible to complete the collocation within 90 days. Specifically: (1) where the CLEC's collocation application requires Qwest or the CLEC to construct a new premises to accommodate adjacent collocation; and (2) where the CLEC seeks remote collocation and Qwest must obtain new rights of way to complete the collocation. The rationale supporting these extremely limited exceptions that Qwest will ultimately seek are briefly set forth below.

## **II. ALTHOUGH NOT SEEKING IT AT THIS TIME, DURING THE 271 WORKSHOPS, QWEST WILL SEEK ADDITIONAL TIME TO PROVISION COLLOCATION UNDER CERTAIN CIRCUMSTANCES.**

### **A. Provisioning Collocation Can Take More than 90 Days.**

There is no real dispute that it takes longer than the FCC's presumptive 90 day collocation interval to complete certain aspects of the collocation provisioning process. Indeed, in discussions during Section 271 workshops, several different CLECs have acknowledged that it takes longer than 90 days to perform certain functions. For example, several parties acknowledge that it takes approximately 6 months or 180 days to add power plant to a central

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<sup>10</sup> *Amended Order* at ¶19.